

# COMPLIANCE PARTNERS LLP

WWW.COMPLIANCEPARTNERS.NET

1629 K STREET, NW • SUITE 300  
WASHINGTON, DC 20006  
TEL: (202) 905-0487 • FAX: (202) 449-1388

WRITER'S EMAIL ADDRESS:  
AGLENN@COMPLIANCEPARTNERS.NET

---

March 1, 2010

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*Re: Annual CPNI Officer Certification  
EB Docket No. 06-36*

Dear Ms. Dortch:

On behalf of Ambess Enterprises, Inc., and pursuant to 47 C.F.R. § 64.2009(e), attached please find the company's CPNI Officer Certification and Accompanying Statement for calendar year 2009.

Should you have any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

Audrey Glenn, Esq.  
*Counsel to Ambess Enterprises, Inc.*

cc: Best Copy & Printing (via email)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2009**  
**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009.

Date Filed: March 1, 2010  
Name of Company: Ambess Enterprises, Inc.  
Form 499 Filer ID: 821772  
Name of Signatory: Pamela S. Nelson  
Title of Signatory: President

Certification:

I, Pamela S. Nelson, certify that I am the President of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: Pamela S. Nelson, 3/1/2010  
Pamela S. Nelson  
President

**Accompanying Statement to**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2009**

The policy of Ambess Enterprises, Inc. (hereinafter “Company” or “the Company”) is to protect the confidentiality of CPNI, as required by section 222 of the Telecommunications Act of 1996, and the FCC’s rules promulgated thereunder.

The Company has established operating procedures to ensure compliance with the Commission’s rules governing the protection of CPNI. Specifically, the Company has adopted a *CPNI Compliance Manual*, which is distributed to each employee within the company who either has, or may have, access to CPNI. The key provisions of the Company’s operating procedures and practices with respect to CPNI are set forth below.

**I. Use of CPNI:**

- The Company does not use, disclose, or permit access to CPNI without customer consent, except as permitted by 47 U.S.C. § 222 and 47 C.F.R. § 64.2005.
- The Company does not use, disclose, or permit access to CPNI for marketing purposes. Nor does the Company disclose or permit access to CPNI to third-parties. Accordingly, the Company has not implemented a system for obtaining customer consent either through the “Opt-in” or “Opt-out” approval processes. Moreover, because the Company does not use, disclose, or permit access to CPNI for any of the foregoing purposes, the Company has no reason to employ customer solicitation notices.

**II. Management Safeguards:**

- The Company has developed a *CPNI Compliance Manual (Manual)*, which sets forth in detail the FCC’s rules and the Company’s policies with respect to the proper use and disclosure of CPNI. The Manual also sets forth in detail the Company’s internal policies and operating procedures with respect to the protection of CPNI.
- The Company has designated a CPNI Compliance Officer who is responsible for the active monitoring, management, and training of all employees with access to CPNI.
- The company has established a program to inform and train all personnel on the proper use and disclosure of CPNI. Such training includes the distribution of a *CPNI Compliance Manual*.
- The Company has established disciplinary procedures for any employee that wrongfully accesses, uses, or discloses CPNI. Any improper use of CPNI is treated as a serious offense, and will result in appropriate disciplinary action.
- Employees are instructed to report each potential CPNI violation or breach to the Company’s CPN Compliance Officer, and the Company has a process for documenting and investigating each potential violation or breach.

- The Company reviews its CPNI procedures on an ongoing basis to ensure compliance with all FCC regulations, and will revise its procedures as needed to reflect any subsequent revisions to the applicable rules and regulations.

### **III. Authentication:**

- The Company uses the procedures specified in 47 C.F.R. § 64.2010 to authenticate a customer's identity before sharing CPNI with that customer.
- For in-person visits, the Company will disclose CPNI to a customer who first presents a Valid Photo ID matching the Customer's Account Information.
- The Company will only disclose CPNI over the telephone, based on customer-initiated contact, if the customer first provides the Company with a password that is not prompted by the Company asking for Readily Available Biographical Information or Account Information.
- The Company will permit online access to CPNI through a password that is not prompted by the Company asking Readily Available Biographical Information or Account Information.

### **IV. Restricted Access to Records**

- The Company's automated information system, which contains the CPNI of the Company's customers, is password-protected.
- There are very few individuals within the company whose password level is sufficient enough to access the portion of the system containing CPNI. These employees receive specialized training concerning the protection of their passwords and physical workstations to ensure the protection of CPNI.
- All physical facilities containing CPNI are secured, with restricted physical access.

### **V. Management of Potential CPNI Security Breaches**

- Consistent with 47 C.F.R. § 64.2011, the Company has adopted procedures for notifying law enforcement of a breach of its customers' CPNI.
- The Company maintains records of any and all potential CPNI breaches.
- Consistent with 47 C.F.R. § 64.2011, the Company has adopted procedures for notifying law enforcement of a breach of its customers' CPNI.
- The Company validates the authenticity of all requests from law enforcement, and ensures that such requests are lawful before releasing CPNI.